

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

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**Case No.: 14-34658  
Judge: SVK  
Chapter: Chapter 13**

**In Re: Angela Nixon**

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**NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN**

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The Debtor, through Geraci Law, LLC, has filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.**

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, then on or before 21 days after service of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of factual and legal basis for the objection. File your written request at:

1. Clerk, U.S. Bankruptcy Court  
517 East Wisconsin Avenue, Room 126  
Milwaukee, WI 53202-4581

and provide copies to

United States Trustee  
Eastern District of Wisconsin  
517 East Wisconsin Avenue, Room 430  
Milwaukee, WI 53202

Mary B. Grossman  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203

Geraci Law, LLC  
Andrew Mark Golanowski  
2505 N. Mayfair Rd. #101  
Wauwatosa, WI 53226

Angela Nixon  
9192 N. 70<sup>th</sup> St.  
Milwaukee, WI 53223

in time for its receipt by the above deadline. If you or your attorney do not take these steps, the Court may decide that you do not oppose the request and may enter an order modifying the Plan.

## REQUEST TO MODIFY CHAPTER 13 PLAN

1. The Proponent of this modification is the Debtor.
2. This is a request to modify a Chapter 13 Plan:
  - a. ☐ post-confirmation
  - b. ☒ pre-confirmation
    - i. Debtor(s)/Debtor(s) attorney certifies that the proposed modification does not materially adversely affect creditors (Local Bankruptcy Rule 3015(b)); or
    - ii. Debtor(s)/Debtor(s) attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the proposed modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors affected are:
3. The Proponent wishes to modify the Chapter 13 Plan to do the following: address the MMM program.
4. The reason(s) for the modification is/are: see above.
5. Select A or B:
  - A. ☐ The confirmed Chapter 13 Plan is modified as follows:
  - B. ☒ The unconfirmed Chapter 13 Plan is modified as follows: the Debtor shall modify her Plan within 30 days if the MMM Program is unsuccessful.

All remaining terms and provisions of the Plan are unaffected unless specifically addressed herein. In the even of a conflict between the original Plan and the modification set forth above, the latter shall supersede and control.

6. **BY SIGNING BELOW THE PROPONENT OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE REMAINING TERMS AND PROVISIONS OF THE PLAN ARE CONSISTENT WITH THE PROPOSED MODIFICATIONS.**

**CERTIFICATION**

Complete one of the certifications below:

1. I/We, \_\_\_\_\_, the debtor(s) in this case, certify that I/we have reviewed the modification to the Chapter 13 plan proposed in this motion, and I/we authorize my/our attorney to file it with the court.

\_\_\_\_\_  
Debtor

\_\_\_\_\_  
Date

\_\_\_\_\_  
Debtor

\_\_\_\_\_  
Date

OR

2. I, Andrew Golanowski, attorney for the debtor(s), certify that I have reviewed the modification proposed above with the debtor(s), and that the debtor(s) has/have authorized me to file it with the court.

WHEREFORE, the Proponent requests that the court approve the modification to the Chapter 13 Plan as stated herein.

Respectfully submitted and dated this Tuesday, October 27, 2015.

By: /s/ Andrew Mark Golanowski  
Andrew Mark Golanowski  
Attorney for Debtor  
Bar #: 1055499

Andrew Mark Golanowski  
Law Offices of Peter Francis Geraci  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (414) 475-0100  
Fax: (312) 332-6354  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

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**CERTIFICATE OF SERVICE**

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The undersigned, an Attorney, does hereby certify that a copy of this Certificate of Service and a copy of the attached Notice and Request to Modify Chapter 13 Plan were mailed First Class to the persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Milwaukee, WI on Tuesday, October 27, 2015:

**SEE ATTACHED LIST**

Angela Nixon  
9192 N. 70<sup>th</sup> St.  
Milwaukee, WI 53223

Additionally, the documents referenced above were also served via electronic means on the following individuals on Tuesday, October 27, 2015:

United States Trustee  
Eastern District of Wisconsin  
517 E. Wisconsin Ave.  
Milwaukee, WI 53202

Mary B. Grossman  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203

Dated this Tuesday, October 27, 2015.

By: /s/ Andrew Mark Golanowski  
Andrew Mark Golanowski  
Attorney of the Debtor  
Bar #: 1055499

Andrew Mark Golanowski  
Law Offices of Peter Francis Geraci  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (414) 475-0100  
Fax: (312) 332-6354  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

Label Matrix for local noticing  
0757-2  
Case 14-34658-svk  
Eastern District of Wisconsin  
Milwaukee  
Tue Oct 27 10:42:42 CDT 2015

BSI Financial Services  
Attn: Bankruptcy Dept.  
314 S Franklin St  
Titusville,PA 16354-2168

ECMC  
Bankruptcy Department  
PO Box 75848, Lockbox 8682  
Saint Paul,MN 55175

Experian  
Attn: Bankruptcy Dept.  
PO Box 2002  
Allen,TX 75013-2002

IRS Non-Priority  
Bankruptcy Dept.  
PO Box 7346  
Philadelphia,PA 19101-7346

Office of the U. S. Trustee  
517 East Wisconsin Ave.  
Room 430  
Milwaukee, WI 53202-4510

QuickClick Loans LLC  
Bankruptcy Department  
PO Box 5040  
Alpharetta,GA 30023-5040

Santander Consumer USA  
Bankruptcy Department  
8585 N. Stemmons Fwy.  
Dallas,TX 75247-3822

U.S. Bank National Association, not in its  
c/o BSI Financial Services, Inc.  
314 S Franklin Street  
Titusville, PA 16354-2168

WFNNB/Avenue  
Bankruptcy Department  
PO Box 182283  
Columbus,OH 43218-2283

U.S. Bank National Association, not in its i  
c/o Gray and Associates LLP  
16345 W Glendale Dr  
New Berlin, WI 53151-2841

(p)CITY OF MILWAUKEE TREASURER S OFFICE  
200 EAST WELLS STREET  
ROOM 103  
MILWAUKEE WI 53202-3599

ESB/HARLEY DAVIDSON CREDIT  
Attn: Bankruptcy Dept.  
Po Box 21829  
Carson City,NV 89721-1829

Falls Collection SVC  
Attn: Bankruptcy Dept.  
Po Box 668  
Germantown,WI 53022-0668

IRS Priority Debt  
Bankruptcy Dept.  
PO Box 7346  
Philadelphia,PA 19101-7346

Professional Placement  
Attn: Bankruptcy Dept.  
272 N 12Th St  
Milwaukee,WI 53233-2604

QuickClick Loans of Wisconsin, LLC  
P.O Box 5040  
Alpharetta, GA 30023-5040

State Collection Servi  
Attn: Bankruptcy Dept.  
2509 S Stoughton Rd  
Madison,WI 53716-3314

University OF Phoenix  
Attn: Bankruptcy Dept.  
4615 E Elwood St Fl 3  
Phoenix,AZ 85040-1908

Wheaton Franciscan Med. Group  
Bankruptcy Department  
PO Box 68-9711  
Milwaukee,WI 53268-0001

American Infosource  
Bankruptcy Dept.  
PO Box 71083  
Charlotte,NC 28272-1083

COMENITY BANK/Avenue  
Attn: Bankruptcy Dept.  
Po Box 182789  
Columbus,OH 43218-2789

Equifax  
Attn: Bankruptcy Dept.  
PO Box 740241  
Atlanta,GA 30374-0241

Harley-Davidson Credit Corp.  
PO Box 9013  
Addison, Texas 75001-9013

Midland Funding, LLC  
Bankruptcy Department  
8875 Aero Drive, # 200  
San Diego,CA 92123-2255

Quantum3 Group LLC as agent for  
Comenity Bank  
PO Box 788  
Kirkland, WA 98083-0788

Santander Consumer USA  
8585 N Stemmons frwy ste#1100  
Dallas, TX 75247-3822

Transunion  
Attn: Bankruptcy Dept.  
PO Box 1000  
Chester,PA 19016-1000

Vanda LLC  
C/o Weinstein & Riley  
2001 Western Ave #400  
Seattle,WA 98121-3132

Wisconsin Dept. of Revenue  
Special Procedures Unit  
PO Box 8901  
Madison,WI 53708-8901

Wisconsin Electric POW  
Attn: Bankruptcy Dept.  
231 W Michigan St # A130  
Milwaukee, WI 53203-2918

Alexander E. George  
Geraci Law L.L.C.  
55 E. Monroe #3400  
Chicago, IL 60603-5920

Andrew M. Golanowski  
Geraci Law, L.L.C.  
55 E. Monroe St. Suite #3400  
Chicago, IL 60603-5920